

**UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

In Re:	:	
	:	:CHAPTER 13
Charles J. Mauceri	:	
xxx-xx-5269	:	
Debtor.	:	CASE NO. 19-10214/MDC
	:	
U.S. Bank Trust National Association,	:	
not in its individual capacity, but solely	:	
as Owner Trustee for Citigroup	:	
Mortgage Loan Trust 2021-A	:	
	:	
Movant,	:	
v.	:	Courtroom Number 2
	:	
CHARLES J. MAUCERI	:	Hearing Date: September 13, 2022 @ 10:30 am
	:	
Debtor,	:	
And	:	
	:	
KENNETH E. WEST	:	
Trustee,	:	
	:	
Respondents.	:	
	:	

STIPULATION RESOLVING RELIEF MOTION

THIS matter being opened to the Court by Emmanuel J. Argentieri of the law office of Romano Garubo & Argentieri, counsel for the secured creditor, Wilmington Savings Fund Society, FSB, not in its individual capacity but solely as trustee of CSMC 2019-RPL5 Trust, (hereinafter “Movant”), upon a motion for relief from the automatic stay as to real property, more commonly known as U.S. Bank Trust National Association, not in its individual capacity, but solely as Owner Trustee for Citigroup Mortgage Loan Trust 2021-A; and it appearing that the parties have amicably resolved their differences and for good cause shown;

1. On or before the close of business for October 24, 2022, Debtor shall bring his post-petition mortgage account current through September 1, 2022. If Debtor does not bring his account current by October 24, 2022, then Movant may immediately file a creditor's certification of default with this Court and request relief from stay.
2. Debtor shall tender his October 1, 2022 and November 1, 2022 post-petition payment timely.
3. Debtor shall reimburse Movant for attorney fees/costs totaling \$1050.00. Commencing with the December 1, 2022 post-petition payment and continuing each month thereafter through May 1, 2023, Debtor shall remit regular monthly mortgage payments, plus 1/6 of the aforesaid fees/costs (\$175.00).
4. Commencing with the June 1, 2023 post-petition mortgage payment and continuing each month thereafter for the duration of this Chapter 13 proceeding, Debtor shall remit payments directly to Movant as same come due.
5. If the case is converted to a Chapter 7, the Movant shall file a Certification of Default with the Court and the Court shall enter an Order granting Movant relief from the automatic stay.
6. If any of the aforementioned stipulation payments and/or regular monthly mortgage payments commencing after the cure of the post-petition delinquency are more than thirty

(30) days late, Movant may send Debtor a written notice of default of this Stipulation. If the default is not cured within ten (10) days of the date of the notice, counsel for the Movant may file a Certification of Default with the Court and the Court shall enter an Order granting Movant relief from the automatic stay as to the mortgaged property herein.

The undersigned hereby consent to the form and entry of the within order.

/S/EMMANUEL J. ARGENTIERI

Emmanuel J. Argentieri, Esquire
Attorney for Movant

Date: 10/12/2022

/S/BRAD J. SADEK

Brad J. Sadek, Esquire
Attorney for Debtor

Date: 10/13/2022

No Objection - Without Prejudice to Any Trustee
Rights and Remedies

/s/ Jack K. Miller

Kenneth E. West, Esquire
Trustee

AND NOW, this 24th day of October 2022, it is hereby
**ORDERED that the foregoing Stipulation is approved, shall be, and is made an Order of
this Court.**

Magdalene D. Coleman

Magdalene D. Coleman
Chief U.S. Bankruptcy Judge